

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND**

STATE OF RHODE ISLAND; et al.,

Plaintiffs,

v.

DONALD J. TRUMP, et al.,

Defendants.

C.A. No.:

**DECLARATION OF DR. LA VONNE J. CORNELL-SWANSON,
PROVOST & VICE-CHANCELLOR FOR ACADEMIC AFFAIRS,
UNIVERSITY OF WISCONSIN-STEVENSON**

Pursuant to 28 U.S.C. § 1746, I, Dr. La Vonne J. Cornell-Swanson, hereby declare as follows:

1. I am a resident of Wisconsin. I am over the age of 18 and have personal knowledge of all the facts stated herein, except as to those matters stated upon information and belief; as to those matters, I believe them to be true. If called as a witness, I could and would testify competently to the matters set forth below.

2. In August of 2022, I was appointed as the Provost and Vice Chancellor for Academic Affairs at the University of Wisconsin-Stevens Point (“UWSP”), which is one of 13 universities and campuses that make up the Universities of Wisconsin.

3. UWSP consists of approximately 8,000 students and 1,100 employees and provides education, research and outreach in a wide array of disciplines, with particular emphases at the baccalaureate level in integrated natural resources management and environmental education; in

the performing and visual arts; and in areas such as business, health and wellness professions, communicative disorders, design, select engineering programs, family and consumer sciences, information science, paper science, social work, and teacher education.

4. As Provost and Vice Chancellor for Academic Affairs at the UWSP, I am responsible for oversight of UWSP's colleges and academic departments. I am also responsible for providing leadership and oversight of the academic affairs budget, grants, and sponsored programs.

5. I submit this declaration in connection with Executive Order 14,238, "Continuing the Reduction of the Federal Bureaucracy," which directed seven federal agencies, including the Institute for Museum and Library Services ("IMLS"), to eliminate any non-statutory components and functions to the maximum extent consistent with applicable law, and to reduce the performance of any statutory functions and associate personnel to the minimum presence and function required by law.

6. It is my understanding that in response to Executive Order 14,238, all IMLS employees have been placed on administration leave.

7. Given my experience, I believe that Executive Order 14,238 and the subsequent actions taken will cause IMLS to be unable to administer the financial award and/or programs on which UWSP relies and on which it expects to rely in the future, causing significant harm to the UWSP Museum of Natural History.

The Museum and Library Services Act

8. In 1996, Congress enacted the Museum and Library Services Act, 20 U.S.C. § 9101 *et seq.*, which is a federal funding statute that provides funding to help support museums across the United States. IMLS, which administers the Museum and Library Services Act, is authorized

to provide federal funding to museums in the form of grants, cooperative agreements, and other forms of assistance. 20 U.S.C. § 9173(a). IMLS is also authorized to provide federal funding to state governments to administer to museums. *Id.*

9. A “museum” is a public, tribal, or private nonprofit agency or institution organized on a permanent basis for essentially educational, cultural heritage, or aesthetic purposes, that utilizes a professional staff, own or utilizes tangible objects, cares for tangible objects, and exhibits the tangible objects to the public on a regular basis.” 20 U.S.C. § 9172(1).

10. Section 9173(a) provides that IMLS may enter into agreements to pay the federal share of the cost of:

(1) supporting museums in providing learning and access to collections, information, and educational resources in a variety of formats (including exhibitions, programs, publications, and websites) for individuals of all ages;

(2) supporting museums in providing learning partnerships with the Nation’s schools, including tribal schools, and developing museum resources, capabilities, and programs in support of State and local efforts to offer a well-rounded educational experience to all students; and

(3) supporting the conservation and preservation of museum collections, including efforts to: provide optimal conditions for storage, exhibition, and use; prepare for and respond to disasters and emergency situations; establish endowments for conservation; curate, stabilize, and organize object-related information; and train museum staff in collections care.

11. UWSP’s Museum of Natural History was awarded a \$74,637 grant from the ILMS’s “Inspire Grants for Small Museum” on July 17, 2024, with a performance period of September 1, 2024 through August 31, 2026. UWSP’s budget for this year includes \$39,500 from this ILMS grant award to fund staffing, design, and purchase of exhibit cases, displays, and equipment based on the anticipated receipt of Federal funding promised.

12. The UWSP Museum of Natural History's collections are used in over 20 classes and by more than 1,350 students each year and more engaging and accessible displays will benefit faculty, researchers, students, and museum visitors. The UWSP Museum of Natural History is the only natural history museum in the Universities of Wisconsin and the single such entity in the central and northern tier of the state.

13. Any pause in our federal funding would delay the completion of this project to the detriment of the museum and UWSP faculty, researchers, students, and museum visitors.

14. The UWSP Museum of Natural History intends to apply for the next round of IMLS Inspire Grant funding to create a North American vertebrate display and Wisconsin woodlands exhibit that is fully accessible. Additionally, new grant funds will be used to create and implement an interpretive plan incorporating accessible measures such as touchscreen media to provide a more comprehensive, full, educational experience impaired visitors and for K-12 students throughout central Wisconsin who attend museum programs as part of their classroom studies.

15. UWSP is currently awaiting payment of \$9,410.24 for grant activity through March 21, 2025, with a remaining grant award balance of \$75,372.76.

16. If we do not receive such disbursements/reimbursements, it will stop the purchase of improvements such as accessible display cases and software offering touchscreen learning resources. These items are needed to allow users with barriers to access the full collection.

17. UWSP faculty have attended professional development activities offered remotely by IMLS grantees such as webinars focusing on how to design effective exhibits. These opportunities have been offered by the IMLS grantees such as the Texas Historical Society. The ability to access fee-free professional development offered by

IMLS grantees has saved the university travel, research, professional development costs for museum staff.

18. If funding is suspended or no longer available, 50% of the collection will remain inaccessible to persons with physical and visual impairments as current display cases have display shelves that cannot be seen by wheelchair users due to their low height and by visually impaired individuals due to the presence of mirrors and the angle of the shelving.

19. A suspension of IMLS funding will prohibit users who have physical or visual impairments from accessing approximately half of the collection and will remove the opportunity for these users to access companion programming such as touchscreen media tools that can enhance their learning experience.

I declare under penalty of perjury under the laws of the United States that, to the best of my knowledge, the foregoing is true and correct.

Executed on April 3, 2025, at Stevens Point, Wisconsin.

Signed by:

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Dr. La Vonne J. Cornell-Swanson